



**Re: Fw: Nammo Talley Groundwater Sampling on SRPMIC Tribal Land**   
**Kevin Wong** to: Cynthia Ruelas

06/14/2012 04:16 PM

From: Kevin Wong/R9/USEPA/US  
To: Cynthia Ruelas/R9/USEPA/US@EPA,

**56,000**

56 PPM? OMG. I thought your 56,000 was ppb with three significant figures after a decimal point. So it really was

**ppb.** Yikes.

Kevin Wong  
Senior RCRA Policy Advisor  
Waste Management Division (WST-4)  
U.S. Environmental Protection Agency, Region 9  
75 Hawthorne Street  
San Francisco, CA 94105-3901  
(415) 972-3334  
Fax (415) 947-3533  
[wong.kevin@epa.gov](mailto:wong.kevin@epa.gov)

Cynthia Ruelas

Kevin - 56,000 ppb! From: Kevin Wong/R9/USEPA/US

06/14/2012 03:58:37 PM

From: Cynthia Ruelas/R9/USEPA/US  
To: Kevin Wong/R9/USEPA/US@EPA,  
Date: 06/14/2012 03:58 PM  
Subject: Re: Fw: Nammo Talley Groundwater Sampling on SRPMIC Tribal Land

Kevin - 56,000 ppb!

Kevin Wong

56 ppb? WOW! Good job tracking down this info. Thanks. Kevin Wong

06/14/2012 03:56:58 PM

From: Kevin Wong/R9/USEPA/US  
To: Cynthia Ruelas/R9/USEPA/US@EPA  
Date: 06/14/2012 03:56 PM

Subject: Re: Fw: Nammo Talley Groundwater Sampling on SRPMIC Tribal Land

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56 ppb? WOW! Good job tracking down this info. Thanks.

Kevin Wong  
Senior RCRA Policy Advisor  
Waste Management Division (WST-4)  
U.S. Environmental Protection Agency, Region 9  
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San Francisco, CA 94105-3901  
(415) 972-3334  
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Cynthia Ruelas

Fyi - results of the borehole sampling within the stormwater accumulation area...

06/14/2012 03:51:30 PM

From: Cynthia Ruelas/R9/USEPA/US  
To: Arlene Kabei/R9/USEPA/US@EPA, Caleb Shaffer/R9/USEPA/US@EPA,  
Cc: Katherine Baylor/R9/USEPA/US@EPA, Kevin Wong/R9/USEPA/US@EPA, Mitch Kaplan/R9/USEPA/US@EPA  
Date: 06/14/2012 03:51 PM  
Subject: Fw: Nammo Talley Groundwater Sampling on SRPMIC Tribal Land

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Fyi - results of the borehole sampling within the stormwater accumulation area near the former Talley facility indicated that perchlorate concentrations were detected at 56,000 ppb. It appears that Talley will now convert the borehole into a permanent well and establish a groundwater monitoring program.

.....  
Cynthia Ruelas  
Environmental Engineer  
RCRA Facilities Management Office  
US Environmental Protection Agency Region 9  
75 Hawthorne Street, Mail Code WST-4  
San Francisco, CA 94105

Tel: (415) 972-3329  
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Email: [ruelas.cynthia@epa.gov](mailto:ruelas.cynthia@epa.gov)

----- Forwarded by Cynthia Ruelas/R9/USEPA/US on 06/14/2012 03:48 PM -----

From: "Anthony C. Leverock" <Leverock.Anthony@azdeq.gov>  
To: Cynthia Ruelas/R9/USEPA/US@EPA  
Cc: "Robin A. Thomas" <Thomas.Robin@azdeq.gov>, "Richard C. Olm" <Olm.Richard@azdeq.gov>  
Date: 06/14/2012 02:58 PM  
Subject: FW: Nammo Talley Groundwater Sampling on SRPMIC Tribal Land

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Cynthia –

Here is an update concerning the subsurface investigation near the Nammo Talley (NT) site.

As you know, NT submitted a workplan in which they agreed to drill a bore hole at the Storm Water Accumulation (SWA) area (on SRPMIC property). The bore hole would be through bedrock until 200 feet bgs. NT would then evaluate the bore hole, looking for evidence of groundwater. If groundwater was encountered, NT would sample at the uppermost groundwater level, and analyze for perchlorate. If perchlorate concentrations were found above detection levels (about 2ppb, using method 314), they would complete the well. However, if no groundwater was found or if no perchlorate was found, the bore hole would be closed, and the investigations terminated.

Last week, NT drilled at the selected site in the SWA. They encountered groundwater, and allowed the bore hole to equilibrate, with water eventually reaching about 40 feet bgs. On Saturday, 6/9/12, NT purged the bore hole, and on Monday 6/11/12 found that ground water had returned to 40 feet bgs. NT then sampled the bore hole for perchlorate. On Tuesday 6/12/12, analytical results were received for NT's sample as well as the ADEQ split show that show perchlorate contamination at about 56,000 ppb.

In accordance with their workplan, NT will have to complete the bore hole as a monitoring well; ADEQ will discuss 'next steps' with NT and the SRPMIC. Perchlorate concentrations of this level may complicate closure of NT's open burn facility ("TTU"), so NT requested an extension to their submittal of a modified Closure Plan for the TTU. Their response to the ADEQ NOD is now due 9/3/12. Attached are the relevant emails with NT and the lab.

We will keep you apprised of further developments.

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**Anthony Leverock**  
**Hazardous Waste Permits Unit**  
**(602) 771-4160 (voice)**  
**(602) 771-4528 (fax)**

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\*\*\*\*\* ATTACHMENT NOT DELIVERED \*\*\*\*\*

----- Message from Robert Blomberg <[RBlomberg@nammotalley.com](mailto:RBlomberg@nammotalley.com)> on Wed, 13 Jun 2012 16:53:45 -0700 -----

**To:** "Anthony C. Leverock" <[Leverock.Anthony@azdeq.gov](mailto:Leverock.Anthony@azdeq.gov)>

**cc:** "PLagas@haleyaldrich.com" <[PLagas@haleyaldrich.com](mailto:PLagas@haleyaldrich.com)>, Brad Anderer <[BAnderer@nammotalley.com](mailto:BAnderer@nammotalley.com)>, "Yu, Wang (Wang.Yu@SRP)" <[Wang.Yu@SRP](mailto:Wang.Yu@SRP)>, "Robin A. Thomas" <[Thomas.Robin@azdeq.gov](mailto:Thomas.Robin@azdeq.gov)>, "Richard C. Olm" <[Olm.Richard@azdeq.gov](mailto:Olm.Richard@azdeq.gov)>, "Cooper, Leslie" <[Leslie.Cooper@aza](mailto:Leslie.Cooper@aza)>

**Subject:** RE: SRP-MIC Well and TTU Closure Plan Response

Thank You!

**From:** Anthony C. Leverock [<mailto:Leverock.Anthony@azdeq.gov>]

**Sent:** Wednesday, June 13, 2012 4:40 PM

**To:** Robert Blomberg

**Cc:** [PLagas@haleyaldrich.com](mailto:PLagas@haleyaldrich.com); Brad Anderer; Yu, Wang ([Wang.Yu@SRPMIC-nsn.gov](mailto:Wang.Yu@SRPMIC-nsn.gov)); Dan Haun; David M. Haag; Robin A. Thomas; Richard C. Olm; Cooper, Leslie

**Subject:** RE: SRP-MIC Well and TTU Closure Plan Response

Robert –

Thanks for apprising us about the groundwater results. Concerning your request for an extension to the Closure Plan deadline, Nammo Talley is granted the 60 day extension. As you have suggested, we believe that a response in letter format addressing all of the issues raised in ADEQ's NOD would be helpful in focusing on resolution to any outstanding issues, and perhaps would reduce the number of revisions to the full Plan. I note that the License Time Frames for closure would not resume until the modified closure plan is formally submitted.

Please submit the narrative response to ADEQ's NOD by not later than September 3, 2012.

If you have any questions, please contact Rich Olm at (602) 771-4223.



**Anthony Leverock**

**Hazardous Waste Permits Unit**

**(602) 771-4160 (voice)**

**(602) 771-4528 (fax)**

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**From:** Richard C. Olm

**Sent:** Wednesday, June 13, 2012 8:26 AM

**To:** Robert Blomberg; Anthony C. Leverock

**Cc:** [PLagas@haleyaldrich.com](mailto:PLagas@haleyaldrich.com); Brad Anderer; Yu, Wang ([Wang.Yu@SRPMIC-nsn.gov](mailto:Wang.Yu@SRPMIC-nsn.gov)); Dan Haun; [mjklein@polsinelli.com](mailto:mjklein@polsinelli.com); David M. Haag; Robin A. Thomas

**Subject:** RE: SRP-MIC Well and TTU Closure Plan Response

Robert:

Just let me know when you have the conference call scheduled. Mornings after 0900 work best for us. It would be beneficial to have Wang and your consultant participate and discuss their thoughts about whether confined aquifer conditions are present, borehole characterization, and monitor well construction. Give us more time about your closure questions.

Thanks

Rich

Richard Olm, P.E.

Senior Environmental Engineer

Waste Permits Section

(602)-771-4223

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**From:** Robert Blomberg [<mailto:RBlomberg@nammotalley.com>]

**Sent:** Tuesday, June 12, 2012 5:03 PM

**To:** Anthony C. Leverock; Richard C. Olm

**Cc:** [PLagas@haleyaldrich.com](mailto:PLagas@haleyaldrich.com); Brad Anderer; Yu, Wang ([Wang.Yu@SRPMIC-nsn.gov](mailto:Wang.Yu@SRPMIC-nsn.gov)); Dan Haun; [mjklein@polsinelli.com](mailto:mjklein@polsinelli.com); David M. Haag

**Subject:** SRP-MIC Well and TTU Closure Plan Response

**SRP-MIC Well** – Based on our preliminary analytical data received for the borehole recently advanced in the stormwater retention area located on the SRP-MIC land, the water appears to be impacted by perchlorate and it is likely that further investigation, including installation of a monitoring well, will be necessary. There may be a scheduling delay for the installation of the monitoring well because the drill rig is currently being used for another Talley project at the Plant #3 site. We would like to set up a phone conference call to discuss our potential for characterizing the borehole, installation of the monitoring well, and review of the analytical results upon receipt of the finalized analytical results.

**TTU Closure Plan Response** – In your letter dated June 4, 2012 (HWP-EX2620) you requested a response by July 5, 2012. Unfortunately, Nammo Talley will not be able to meet that response schedule and will require an extension of 60 days while the new consultant (Haley & Aldrich) gets up to speed with the transferred documents from Brown & Caldwell. HOWEVER, given the above new information regarding the impacted water located in the borehole, does it make sense to submit a revised closure plan prior to the

well installation and additional sampling? Would ADEQ consider holding off on the revision until this is completed and the info can be added into the Closure Plan? An alternative would be for Nammo Talley to respond to the NOD in letter format so we can work through any issues and avoid multiple revisions to the current Closure Plan.

Please let us know what ADEQ would prefer as we move forward.

**Robert Blomberg**

Environmental Manager

**Nammo Talley, Inc.** - P.O. Box 34299 - Mesa, AZ. 85277-4299

Tel: 480-898-2433 - Cell: 480-226-0607 - Fax: 480-898-2410

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----- Message from "Lowell M. Carty" <[Carty.Lowell@azdeq.gov](mailto:Carty.Lowell@azdeq.gov)> on Wed, 13 Jun 2012 17:20:24 -0700 -----

**To:** "Anthony C. Leverock" <[Leverock.Anthony@azdeq.gov](mailto:Leverock.Anthony@azdeq.gov)>, "Richard C. Olm" <[Olm.Richard@azdeq.gov](mailto:Olm.Richard@azdeq.gov)>, "David M. Haag" <[Haag.David@azdeq.gov](mailto:Haag.David@azdeq.gov)>

**cc:** Julie Hoskin <[Hoskin.Julie@azdeq.gov](mailto:Hoskin.Julie@azdeq.gov)>

**Subject:** FW: report

Fyi –  
56000 ug/L perchlorate in the groundwater sample  
ND for the canal

Looks like the boring will be completed as a well.

Let me know how things progress and if anything else is needed.

Thanks  
Lowell Carty  
(602) 771-4413  
[carty.lowell@azdeq.gov](mailto:carty.lowell@azdeq.gov)  
Arizona Department of Environmental Quality  
1110 W. Washington Street, Mailcode: 4415B-1  
Phoenix, Arizona 85007

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**From:** Glass, Suzanne [<mailto:Suzanne.Glass@testamericainc.com>]  
**Sent:** Wednesday, June 13, 2012 3:15 PM  
**To:** Richard C. Olm; Lowell M. Carty  
**Subject:** report

If you have any questions, please let me know.

**SUZANNE GLASS**

Project Manager

**TestAmerica**  
THE LEADER IN ENVIRONMENTAL TESTING

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[attachment "PVF0655.pdf" deleted by Kevin Wong/R9/USEPA/US]